## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

NATIONAL GRANGE MUTUAL INS. CO.

a/s/o ENGINEERING DESIGN ASSOCIATES : CIVIL ACTION NO. 04-30199-KPN

:

Plaintiff

:

CITY OF SPRINGFIELD

and

v.

SPRINGFIELD WATER AND SEWER COMM.

:

Defendants

## CONSENT MOTION TO RESCHEDULE FINAL PRETRIAL CONFERENCE

On January 19, 2006, this Honorable Court scheduled a Final Pretrial Conference for May 15, 2006 at 2:00 p.m. before Magistrate Judge Kenneth P. Neiman.

Due to an unanticipated family-related scheduling conflict, plaintiff's counsel is unable to attend the conference as scheduled on May 15, 2006. Counsel for the parties discussed the conflict and agreed to petition the Court for an adjournment of the Pretrial Conference.

Accordingly, the undersigned respectfully requests that the Final Pretrial Conference be rescheduled at the Court's convenience. If the Court deems it appropriate, plaintiff's counsel will coordinate a telephone conference call with counsel and the Court to discuss a new date for the Final Pretrial Conference.

Respectfully submitted,

COZEN O'CONNOR

BY: /s/ Sean P. O'Donnell

SEAN P. O'DONNELL, ESQUIRE

Attorneys for Plaintiff

## **CERTIFICATE OF SERVICE**

I, Sean P. O'Donnell, hereby certify that a true and correct copy of the Consent Motion to Reschedule Final Pretrial Conference was filed electronically and addressed as follows:

> John T. Liebel, Esquire Assistant City Solicitor City of Springfield Law Department 36 Court Street Springfield, MA 01103

> > /s/ Sean P. O'Donnell\_ SEAN P. O'DONNELL, ESQUIRE